

# EXHIBIT 21

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION**

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RUSSELL, et al.	)	
	)	
	)	
Plaintiffs,	)	
	)	Case No. 4:19-cv-00226
v.	)	(Class Action)
	)	The Honorable Lee H. Rosenthal
HARRIS COUNTY, TEXAS, et al.	)	U.S. District Judge
	)	
Defendants.	)	
	)	

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**DECLARATION OF HOLLY MCGOWAN**

I, Holly McGowan declare and affirm the following:

1. I am over the age of 18 and competent to make this Declaration.
2. From August 26, 2022, to September 25, 2022, I was retained by Plaintiffs' Counsel as a volunteer to review a series of videos of 15.17 hearings conducted in Harris County, Texas.
3. My review was supervised by Priyanka Shetty, an investigative fellow at Civil Rights Corps.
4. Ms. Shetty provided me with video footage of 9 separate dockets, containing a total of 53 individual 15.17 hearings for arrestees charged with felony offenses. The dockets began on January 1, 2022, at 8:13 PM, February 3, 2022 at 10:45 PM, March 4, 2022 at 12:49 PM, April 1, 2022, at 8:17 PM, April 3, 2022 at 5:19 PM, April 7, 2022 at 6:16 PM, May 2, 2022 at 5:22 PM, May 6, 2022 at 1:11 AM, and May, 7 2022 at 2:40 PM, respectively. I watched the entirety of each docket.

5. Among all 53 individual hearings occurring between January 1 and May 7, 2022 that I reviewed, I did not witness a single hearing in which an arrestee accused of a felony offense ever received an unsecured (or “personal”) bond at their 15.17 hearing.

I declare under penalty of perjury that the above information is true and correct to the best of my knowledge.

DocuSigned by:

Holly McGowan  
72302807932E4B1...  
Holly McGowan

11/16/2022

Date